



**INDICTMENT**

**THE GRAND JURY CHARGES THAT**

**COUNT ONE**

**[21 U.S.C. 846 - Conspiracy to Possess With Intent  
to Distribute a Controlled Substance]**

From in or about October 2011, up to and including August 2012, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

**THU LOAN DINH  
VAN LONG TRAN  
THANG VAN DOAN  
QUY NGOC NGUYEN  
YEN THI DO  
ANH QUANG NGUYEN  
HONG NHUT DANG  
LONG NGUYEN  
LONG DO  
THIET VAN NGUYEN  
THI NGO  
VINH CONG LE  
TAM NGUYEN  
TIMMY DANG  
HUU TRONG VU  
IDA PHAM  
HUNG HUY NGUYEN  
TRUONG LAM  
GIOI THE NGUYEN  
KHAC HUNG DINH  
TAI TAN NGUYEN  
TRANG THI KIM TRUONG  
TIEN VAN NGUYEN  
DINH HUU LE  
HEIN LE  
JOHNNY NG**

did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to commit an offense

defined in Title 21, United States Code, § 841, namely, to possess with intent to distribute a controlled substance. The overall scope of the conspiracy involved one thousand (1000) or more marijuana plants, a Schedule I Controlled Substance.

In violation of Title 21, United States Code, §§ 846 and 841(a)(1), 841(b)(1)(A)(vii).

**COUNT TWO**

**[21 U.S.C. 846 - Conspiracy - Maintaining a Place of Manufacturing]**

From in or about October 2011, up to and including August 2012, in the Southern District of Texas and elsewhere, and within the jurisdiction of this Court, the defendants,

THU LOAN DINH  
VAN LONG TRAN  
THANG VAN DOAN  
QUY NGOC NGUYEN  
YEN THI DO  
ANH QUANG NGUYEN  
HONG NHUT DANG  
LONG NGUYEN  
LONG DO  
THIET VAN NGUYEN  
THI NGO  
VINH CONG LE  
TAM NGUYEN  
TIMMY DANG  
HUU TRONG VU  
IDA PHAM  
HUNG HUY NGUYEN  
TRUONG LAM  
GIOI THE NGUYEN  
KHAC HUNG DINH  
TAI TAN NGUYEN  
TRANG THI KIM TRUONG  
TIEN VAN NGUYEN

**DINH HUU LE  
HEIN LE  
JOHNNY NG**

did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree with each other and others known and unknown to the Grand Jury, to commit an offense defined in Title 21, United States Code, § 856, namely maintaining a place for the purposes of manufacturing, distributing and using controlled substances. The overall scope of the conspiracy involved one thousand (1000) or more marijuana plants, a Schedule I Controlled Substance.

In violation of Title 21, United States Code, §§ 846 and 856(a)(1).

**NOTICE OF CRIMINAL FORFEITURE**  
**[21 United States Code, Section 853]**

Pursuant to Title 21, United States Code, Section 853(a)(1) and (2), as a result of the commission of any of the offenses charged in Count One and Two in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A) and 846, notice is given to the defendants:

**THU LOAN DINH  
VAN LONG TRAN  
THANG VAN DOAN  
QUY NGOC NGUYEN  
YEN THI DO  
ANH QUANG NGUYEN  
HONG NHUT DANG  
LONG NGUYEN  
LONG DO**

THIET VAN NGUYEN  
THI NGO  
VINH CONG LE  
TAM NGUYEN  
TIMMY DANG  
HUU TRONG VU  
IDA PHAM  
HUNG HUY NGUYEN  
TRUONG LAM  
GIOI THE NGUYEN  
KHAC HUNG DINH  
TAI TAN NGUYEN  
TRANG THI KIM TRUONG  
TIEN VAN NGUYEN  
DINH HUU LE  
HEIN LE  
JOHNNY NG

that in the event of conviction the following property shall be forfeited to the United States of America-

- (1) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of any such violation; and
- (2) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, any such violation,

The property subject to forfeiture includes, but is not limited to the following property:

- a) 2003 Acura, Texas Plate BP2G370, VIN 2HNYD18623H545245, seized on or about August 21, 2012.
- b) 2003 Dodge Caravan, Texas Plate BL6V815, VIN 1D4GP24393B251217, seized from defendant **Yen Thi DO** on or about August 21, 2012.
- c) 2007 Toyota Sienna, Texas Plate DG9H992, VIN JTHBF5C24A5115222, seized from defendant **Van Long TRAN** on or about August 21, 2012, and registered to defendant **Nhan D. PHAM**.
- d) 2010 Lexus IS250, Texas Plate BN2V300, VIN 5TDZK23C27SO14136, seized from **Thu Loan Dinh** on or about

August 21, 2012,

e) 2001 Honda Odyssey, Texas Plate DG2M199,  
VIN 2HKRL18641H608461, seized from **Thi NGO** on or about  
August 21, 2012

f) 2003 jChrysler Town and Country, Texas Plate BZ1B610,  
Vin 2C4GP44393R310857, seized from **Anh Quang NGUYEN** on or  
about August 21, 2012.

g) 1999 Toyota Sienna, Texas Plate BL2T673,  
VIN 4T3ZF13C9XU148705, seized from **Hong DANG** on or about  
August 21, 2012.

h) Assorted lights, nutrients, electrical equipment, and other assorted  
equipment related to hydroponic from the business location of Green  
Earth Supply managed by defendant **Ida PHAM**.

I) Assorted lights, nutrients, electrical equipment and other assorted  
equipment related to hydroponic cultivation seized by a warehouse unit  
leased by **Truong LAM** on or about August 21, 2012.

j) Approximately \$53,980.00 in U.S. Currency seized from defendant  
**Van Long TRAN** on or about August 21, 2012.

k) Approximately \$16,509.00 in U.S. Currency seized from defendant  
**Thu Loan DINH** and **Van Long TRAN** on or about August 21, 2012.

l) Approximately \$31,298.00 in U.S. Currency seized from defendants  
**Thang Van DOAN, Long DO, Long NGUYEN** and **Tam NGUYEN** on or  
about August 21, 2012.

m) Approximately \$5,000.00 in U.S. Currency seized from defendant  
**Hong Nhut DANG** on or about August 21, 2012.

n) Approximately \$6,383.00 in U.S. Currency seized from defendants  
**Ida PHAM** and **Hung Huy NGUYEN** on or about August 21, 2012.

o) Approximately \$5,600.00 in U.S. Currency seized from defendant  
**Huu Trong VU** on or about August 21, 2012.

p) Approximately \$2,646.00 in U.S. Currency seized from defendant  
**Khac Hung DING** on or about August 21, 2012.

q) Approximately \$1,700.00 in U.S. Currency seized from defendant  
**Tai Tan NGUYEN** on or about August 21, 2012.

r) Approximately \$12,900.00 in U.S. Currency seized from defendant **Trang Thi Kim TRUONG** on or about August 21, 2012.

s) Approximately \$8,335.00 in U.S. Currency seized from defendant **Anh Quang NGUYEN** on or about August 21, 2012.

t) Approximately \$5,000.00 in U.S. Currency seized from defendant **Hong Nhut DANG** on or about August 21, 2012.

u) Approximately \$3,044.00 in U.S. Currency seized from defendants **Huu Trong VU** and Timmy DANG on or about August 21, 2012.

v) Approximately \$2,450.00 in U.S. Currency seized from defendants **Thi NGO** and **Thiet Van NGUYEN** on or about August 21, 2012.

w) Approximately \$5,240 in U.S. Currency seized in Missouri City, TX, on or about August 21, 2012.

x) At least \$25,000,000.00 in U.S. Currency, estimated gross proceeds.

#### **MONEY JUDGEMENT**

Defendants are notified that upon conviction, a money judgment may be imposed equal to the value of the property subject to forfeiture estimated at \$25,000,000.00, for which the defendants may be jointly and severally liable.

#### **SUBSTITUTE ASSETS**

In the event that the property which is subject to forfeiture to the United States, as a result of any act or omission of the defendant:

- (1) cannot be located upon exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or

- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property, pursuant to 21 U.S.C. § 853(p).

**A TRUE BILL**

Original Signature on File

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON  
United States Attorney

By:

  
JESSE RODRIGUEZ  
Assistant United States Attorney